

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action

Plaintiff,

No. 2:22-cv-547-MJH

vs.

MICHAEL RUSSIN, RUSSIN FINANCIAL,  
RUSSIN GROUP, SIMON ARIAS, III, ARIAS ELECTRONICALLY FILED  
AGENCIES, S.A. ARIAS HOLDINGS, LLC,  
AMERICAN INCOME LIFE INSURANCE  
COMPANY, JURY TRIAL DEMANDED


Defendants.

**DECLARATION OF SIMON ARIAS, III**

I, Simon Arias, III, declare under penalty of law as follows:

1. I am an adult, residing in the Commonwealth of Pennsylvania, and I am a named defendant in the above-captioned matter. I have personal knowledge of the information set forth below.
2. My office address is 150 Lake Drive, Suite 105, Wexford, Pennsylvania 15090.
3. I am a State General Agent ("SGA") for American Income Life Insurance Company ("AIL"). Pursuant to my contract with AIL, I am an independent contractor of AIL.
4. I am the President and owner of Arias Agencies, LLC, through which I conduct my insurance business as an SGA for AIL.
5. As an SGA for AIL, Plaintiff Renee Zinsky ("Plaintiff") was an agent affiliated with my office. As is standard procedure, I am a signatory to the Agent Agreement for Plaintiff.
6. I know Plaintiff, and I am personally familiar with her Agent Agreement. Under her most recent Agent Agreement she reported to me.
7. As an SGA for AIL, I am expressly included in the arbitration clause of Plaintiff's Agent Agreement. (Mot. To Compel Arb., Gamble Decl., Ex. 1.)
8. I am also the President and owner of S.A. Arias Holdings, LLC.
9. S.A. Arias Holdings, LLC, owns and/or leases the properties used by Arias Agencies, LLC, in its insurance business for AIL.

I, Simon Arias, III, declare the facts above to be true to the best of my knowledge, information, and belief.

	
Signature, Simon Arias, III	Date

June 13, 2022